

Exhibit 24

Subject: Re: Sony v. Cox - discovery
Date: Thursday, May 16, 2019 at 10:53:49 AM Eastern Daylight Time
From: Jeff Gould
To: Golinveaux, Jennifer A., Anderson, Sean R., Kearney, Thomas
CC: Kerry Mustico
Attachments: Re: Sony v. Cox - Redacted declarations.eml

Jennifer – we haven't heard back from you on the outstanding issues below (other than 3 and 9). Thank you for providing the declarations from 3 below. Please provide the other declarations I asked about in my May 13 email (attached).

Thanks,
Jeff

Jeffrey M. Gould
Oppenheim + Zebrak, LLP
202.851.4526 (direct)
jeff@oandzlaw.com

From: Jeff Gould <Jeff@oandzlaw.com>
Date: Friday, May 10, 2019 at 5:59 PM
To: "Golinveaux, Jennifer A." <JGolinveaux@winston.com>, "Anderson, Sean R." <sranderson@winston.com>, "Kearney, Thomas" <TKearney@winston.com>
Cc: Kerry Mustico <Kerry@oandzlaw.com>
Subject: Sony v. Cox - discovery

Jennifer – We have a number of open discovery issues that we need to resolve.

1. Weekly and/or monthly abuse reports generated by abuse category. See my emails of 5/6-7.
2. Stifel, Rosen, Consumer Insights documents. See my email of 5/8.
3. Unredacted Beck, Cadenhead, Sikes, Zabek summary judgment declarations from BMG. See my email of 5/10.
4. Cox has refused to produce the narrative discussion, notes and other information in its 2012-2014 audited financial statements, other than the Balance Sheet, Income Statement/Statement of Operations, and Statement of Cash Flows. See my email of 4/26.
5. Cox's privilege log is deficient in numerous ways, including at least because it does not identify attorneys and includes email distribution for which Cox does not know the recipients. Cox has promised on multiple occasions to supplement its log but has not done so.
6. Cox has not formally produced the Tregillis' documents with bates numbers or any additional expert-related documents, which Sean mentioned were forthcoming.
7. Cox has not yet identified a witness who will testify on Topics 7, 21, 42 or 47.
8. Cox has refused to produce videos of the fact depositions of Cox witnesses in the BMG case. There is no basis for this refusal, nor fairness in Cox being able to use and present these for any unavailable witnesses at the trial in this case while Plaintiffs cannot. See my emails of 3/26 and 4/17.
9. I had asked a couple times if we can move Stifel and Negretti from 5/23-24 to any of the days

between 5/21-23. Please let me know if that's possible.

Please let me know where we stand on these issues. I'm available to confer early next week.

Regards,
Jeff

Jeffrey M. Gould
Oppenheim + Zebrak, LLP
4530 Wisconsin Avenue, NW | Suite 500
Washington, DC 20016
202.851.4526 direct | 202.480.2999 main
jeff@oandzlaw.com | www.oandzlaw.com

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